

EXHIBIT M

Pages 1 - 48

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

Before The Honorable Lisa J. Cisneros, Magistrate Judge

IN RE: UBER TECHNOLOGIES,)
INC., PASSENGER SEXUAL ASSAULT)
LITIGATION.)
) NO. 3:23-MD-03084-CRB
)
_____)

San Francisco, California
Thursday, February 27, 2025

TRANSCRIPT OF REMOTE ZOOM PROCEEDINGS

APPEARANCES (VIA ZOOM) :

For Plaintiffs:

CHAFFIN LUHANA, LLP
600 Third Avenue, 12th Floor
New York, NY 10016
ROOPAL P. LUHANA
ELIZABETH M. WILKINS
ATTORNEYS AT LAW

LIEFF, CABRASER, HEIMANN & BERNSTEIN LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111

BY: SARAH R. LONDON
ATTORNEY AT LAW

PEIFFER, WOLF, CARR, KANE,
CONWAY & WISE, LLP
2229 Trumbull Street
Detroit, MI 48216

BY: TIFFANY R. ELLIS
ATTORNEY AT LAW

(Appearances continued on following page.)

Reported By: Stephen W. Franklin, RMR, CRR, CPE
United States Reporter

1 any apparent errors that are taking place that's, you know,
2 based on the original data itself and not necessarily based on
3 production issues. We want them to do quality control before
4 they produce, you know, the data test to ensure that it's
5 accurate.

6 And lastly, they've produced and extracted all the safety
7 data, and they've produced about 11 files, and now they're
8 going to I believe reproduce them to only four files. So of
9 course the data is being extrapolated and then produced in
10 these four files. We just kinda want like an instructional
11 manual just for them to explain to us what they've done to
12 export the data, divvy it up. So then when we're building it
13 up and our experts are utilizing it and analyzing it, we're
14 doing it consistently and putting it together as it needs to be
15 put together.

16 So we think it's a simple ask. And as I said, we have
17 been working with the defendants and are almost there, but we
18 certainly need finality here because we need to be able to
19 utilize and rely upon the data.

20 **MR. SHORTNACY:** Judge, Michael Shortnacy speaking for
21 the defendants.

22 I would say, I mean, I'm largely aligned with Ms. Luhana.
23 We have been working together with Ms. Ellis, with Ms. Wilkins
24 in a very cooperative and collaborative and transparent way.

25 One correction is that the defendants did comply with the

PROCEEDINGS

1 Court's order and produced data on 1/17 as required. There was
2 additional work, and this was reflected in the last JSR that we
3 submitted. There was additional work that we needed to do to
4 de-identify certain fields, and so we quickly provide a
5 replacement for that on January 23rd. So I just wanted to
6 clarify that.

7 I think what in broad strokes what Ms. Luhana has
8 outlined, we are working together and are probably on
9 the 1-yard-line. We have, at plaintiffs' request, consolidated
10 some of the files, because they come from different places.
11 There's JIRA and there's Bliss. And so there were a number of
12 different files as they were pulled out of the system that
13 we've worked with plaintiffs on how to consolidate those files
14 the way that they would like them to be, and we have also
15 worked with them on, you know, working through some of the
16 issues that have come up on the collections and understand
17 their request for some level of certification. We have
18 undertaken efforts to verify the collection efforts and are
19 amenable to providing a certification along the lines of what
20 Ms. Luhana is asking for, and I think the certifications that
21 have previously been provided with respect to the fields that
22 were collected have also been given to the plaintiff. So those
23 certifications have been made.

24 I understand Ms. Luhana was asking for something more
25 here, which in principle we are, I think, aligned on. I think